STANDARD FORM 83-I SUPPORTING STATEMENT
FOR OMB REVIEW OF ICR NO. 1983.02

INFORMATION COLLECTION REQUEST FOR THE CHANGES TO GENERIC MACT TO INCORPORATE THE CARBON BLACK PRODUCTION SOURCE CATEGORY CYANIDE CHEMICALS MANUFACTURING SOURCE CATEGORY ETHYLENE PRODUCTION SOURCE CATEGORY AND SPANDEX PRODUCTION SOURCE CATEGORY

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PART A OF THE SUPPORTING STATEMENT

1. Identification of the Information Collection

(a) Title and Number of the Information Collection.

"Recordkeeping and Reporting Requirements for Source Categories: Generic Maximum Achievable Control Technology Standards." This is a new information collection request (ICR). This is a new information collection request (ICR) and the tracking number is EPA ICR No. 1983.02.

(b) Short Characterization.

This ICR is prepared for a U.S. Environmental Protection Agency (EPA) proposed rulemaking being developed under authority of Section 112 of the Clean Air Act (Act). The proposed rulemaking would amend title 40, chapter I, part 63 of the Code of Federal Regulations (CFR) by adding additional standards to the existing subpart YY -- National Emission Standards for Hazardous Air Pollutants for Source Categories: Generic Maximum Achievable Control Technology Standards (this subpart is referred to as the "generic MACT NESHAP"). The generic MACT NESHAP includes standards for major sources of hazardous air pollutants (HAP). Respondents are owners or operators of source category affected sources regulated under the generic MACT NESHAP.

This ICR is for HAP emission sources in the carbon black (CB) production, cyanide (CY) chemicals manufacturing, ethylene (ET) production, and spandex (SP) production source categories. For the purposes of this ICR the phrases "cyanide chemicals manufacturing," "cyanide production," and "CY production" have the same meaning.

The CB production source category consists of 20 facilities that would (and 2 facilities that would not) be subject to the major source provisions specified under the generic MACT NESHAP.

We anticipate that 5 of these facilities will conduct all monitoring, inspection, recordkeeping, and reporting (MIRR) requirements, including testing activities. The estimated MIRR costs per facility to conduct all MIRR activities is $47,790. Fifteen facilities will conduct all MIRR requirements, except testing activities. The estimated MIRR costs per facility to conduct all MIRR activities, except testing and related tasks, is $45,740. The two facilities that are not major sources will read the rule. The estimated costs for this one activity is $410 per facility. Based on these estimates, the total MIRR cost of the proposed rulemaking for the carbon black production source category is estimated to be $925,830 for the first three years after promulgation of the proposed standards. See Section 6 for more details.

The CY production source category consists of 14 facilities that would (and 2 facilities that would not) be subject to the major source provisions specified under the generic MACT NESHAP. We anticipate that only 1 of these facilities will be subject to all monitoring, inspection, recordkeeping, reporting (MIRR) requirements, including testing and control device design analysis activities, excluding those associated with the development of a new leak detection program. The estimated MIRR costs per facility to conduct these activities is $58,460. Eight facilities will be subject to all monitoring, inspection, recordkeeping, reporting, and leak detection system requirements, excluding those associated with control equipment design analysis. The estimated MIRR costs to conduct these activities is $59,076 per facility. Five facilities will be subject to general reporting and recordkeeping requirements, excluding those associated with control device design analysis and implementation of a new leak detection system. The estimated MIRR costs to conduct these activities is $56,414 per facility. The two

facilities that are not major sources will read the rule and review rule information. The estimated costs for these two activities is $614 per facility. Based on these estimates, the total MIRR cost of the proposed rulemaking for the cyanide chemicals manufacturing source category is estimated to be $814,366 for the first three years after promulgation of the proposed standards. See section 6 for more details.

The ET production source category consists of 37 facilities that would be subject to the major source provisions specified under the generic MACT NESHAP. We anticipate that all 37 of these facilities are major sources and will conduct all monitoring, inspection, recordkeeping, and reporting (MIRR) requirements, including testing activities. The estimated MIRR costs per facility to conduct all MIRR activities is $72,383. Based on these estimates, the total MIRR cost of the proposed rulemaking for this source category is estimated to be $2,678,184 for the first three years after promulgation of the proposed standards. See section 6 for more details.

The SP production source category consists of 2 facilities that would be subject to the major source provisions specified under the generic MACT NESHAP. We anticipate that these 2 facilities will conduct all monitoring, inspection, recordkeeping, and reporting (MIRR) requirements, including testing activities. The estimated MIRR costs per facility to conduct all MIRR activities is $56,050. This gives total MIRR costs of $112,110 for the spandex production source category during the first three years after promulgation of a NESHAP for this source category. See section 6 for more details.

All existing sources must be in compliance with the requirements of the generic MACT NESHAP within 3 years of the effective date (promulgation date) of standards for an affected source. All new sources must be in compliance with the

requirements of the generic MACT NESHAP upon startup or the promulgation date of standards for an affected source, whichever is later.

2. Need For and Use of the Collection

(a) Need/Authority for the Collection.

The EPA has been directed by section 112 of the Act to regulate the emission of HAP from stationary sources. Carbon black, cyanide, ethylene and spandex production source categories; and any source categories that may be regulated under the generic MACT NESHAP in the future are major sources of HAP emissions included on the EPA's list of categories scheduled for regulation.

Section 114 of the Act gives the EPA authority to collect data and information necessary to enforce standards established under section 112 of the Act. Certain records and reports are necessary to enable the Administrator to (1) identify existing and new sources subject to the generic MACT NESHAP and (2) ensure that the requirements specified for an affected source subject to the generic MACT NESHAP, which are based on MACT, are being achieved.

(b) Use/Users of the Data.

The information will be used by the EPA's enforcement personnel to (1) identify existing and new HAP emission points subject to the generic MACT NESHAP, (2) identify the emission control devices and methodologies being applied, and (3) ensure that the emission control devices and methodologies are being properly operated and maintained on a continuous basis.

Records and reports are necessary to enable the EPA to identify facilities subject to the generic MACT NESHAP that may not be in compliance. Based on reported information, the EPA can decide whether to inspect a facility and which records or

processes to inspect. The records that facilities maintain would indicate to the EPA whether facility personnel are operating and maintaining emission control devices and methodologies properly.

3. The Respondents and the Information Requested

(a) Respondents/SIC and NAICS Codes.

Respondents are owners or operators of HAP-emitting affected sources in the CB production, CY production, ET production, and SP production source categories; and HAP-emitting affected sources in source categories with a limited population of major sources that may be regulated under the generic MACT standards in the future. The source categories and affected sources regulated with the initial proposal of the generic MACT NESHAP are classified in the four-digit Standard Industrial Classification (SIC) Codes: 2895 for CB productiuon; 2819 and 2869 for CY production; 2869 for ET production; and, 2824 for SP production. The source category and affected sources regulated with this proposal are also classified in the six-digit North American Industrial Classification System (NAICS) codes: 325182 for CB productiuon; 325188 and 325199 for CY production; 325110 for ET production; and, 325222 for SP production. Not all processes and facilities classified under these SIC and NAICS codes would be regulated under the generic MACT NESHAP.

(b) Information Requested.

(i) *Data items, including recordkeeping requirements*. The generic MACT NESHAP would require that an owner or operator of a major source reduce specified affected source HAP emissions. The affected source and emissions control requirements are determined on a source category-specific basis. Attachment 1, Source Data and Information Requirement, summarizes the recordkeeping and reporting requirements, and specific rule provisions that require them, for the CB production, CY production, ET production, and SP

production source categories. Information requirements being proposed under the generic MACT NESHAP that would apply to all source categories that would be regulated with this proposal are discussed in the following paragraphs.

Respondents are required to submit one-time reports of the (1) start of construction for new facilities, (2) anticipated and actual start-up dates for new facilities, and (3) physical or operational changes to existing facilities. Owners and operators must also submit semi-annual reports of the monitoring results under the leak detection and repair program (if applicable for a subject source category). All records are to be maintained by the facility for a period of at least 5 years.

An affected source with an initial startup date before the promulgation date of standards for an affected source under the generic MACT NESHAP must submit a one-time initial notification. This initial notification must be submitted within one year after the promulgation date of standards for an affected source under the generic MACT NESHAP (or within 1 year after the affected source becomes subject to the generic MACT NESHAP).

For sources constructed or reconstructed after the promulgation date of standards for an affected source under the generic MACT NESHAP, the source must submit an application for approval of construction or reconstruction. The application is required to contain information on the air pollution control that will be used for each potential HAP emission point.

The information in the initial notification and the application for construction or reconstruction will enable enforcement personnel to identify the number of sources subject to, or are already in compliance with, the standards.

Affected sources subject to standards under the generic MACT NESHAP must submit a notification of compliance status. This notification must be signed by a responsible company official who

certifies its accuracy and that the affected source has complied with the relevant standards. Performance test results (as applicable) are included as part of the compliance status report. The notification of compliance status must be submitted within 60 days after the compliance date specified for an affected source subject to the generic MACT NESHAP.

In addition, affected sources subject to the proposed generic MACT NESHAP that would be required to install continuous parameter monitoring systems (CPMS) are required to conduct a performance evaluation of the CPMS. A report of the performance evaluation results is required to be submitted to the delegated authority. Excess emissions and CPMS performance reports documenting excess emissions and parameter monitoring exceedances are required to be submitted to the delegated authority semi-annually. Submittal of these reports is required quarterly when the CPMS data are used to demonstrate compliance and the facility experiences excess emissions.

The generic MACT NESHAP requires owners or operators of affected sources to develop startup, shutdown, and malfunction plans, documenting procedures that will be taken in the case of any of these events. Startup, shutdown, and malfunction reports demonstrating the actions taken by an owner or operator in the event of a startup, shutdown, or malfunction are required to be submitted. Reports are required semi-annually when actions taken are consistent with the plan. Immediate reports are required when actions taken are inconsistent with the plan.

The generic MACT NESHAP would require owners or operators of an affected source to retain records for 5 years, which exceeds the three year retention period contained in the guidelines in 5 CFR 1320.6. The 5 year retention period is consistent with the provisions of the General Provisions of 40 CFR Part 63 and the

retention requirement in the operating permit program under Title V of the Act.

(ii) Respondent Activities.

Respondent activities for major sources are shown for each of the first 3 years following promulgation of the rule. The respondent activities required by the generic MACT NESHAP for the CB production, CY production, ET production, and SP production source categories for existing sources are presented in the first column of Tables 1a, 1b, and 1c for CB production; Tables 2a, 2b, and 2c for CY production; Tables 3a, 3b, and 3c for ET production; and Tables 4a, 4b, and 4c for SP production. There are no new sources anticipated for any of these source categories within the first 3 years after promulgation of standards for subject affected sources. These tables are introduced in Section 6(a) of this ICR.

4. The Information Collected--Agency Activities, Collection Methodology, and Information Management

(a) Agency Activities.

A list of the EPA's activities is provided in Tables 5a through 5d. These tables are introduced in Section 6(c) of this ICR.

(b) Collection Methodology and Management.

Information contained in the one-time only reports will be entered into the Aerometric Information Retrieval System (AIRS) Facility Subsystem (AFS) that is maintained and operated by the EPA's Office of Air Quality Planning and Standards (OAQPS). Data obtained during periodic visits by EPA personnel from records maintained by the respondents will be tabulated and published for internal EPA use in compliance and enforcement programs.

(c) Small Entity Flexibility.

Minimizing the information collection burden for all sizes of organizations is a continuing effort on the EPA's part. The EPA has reduced the recordkeeping and reporting requirement respondent burden to include only the information needed by the EPA to determine compliance with the generic MACT NESHAP.

(d) Collection Schedule.

Collection of data will begin after promulgation of standards under the generic MACT NESHAP. The schedule for reports required by the generic MACT NESHAP for the CB production, CY production, ET production, and SP production source categories; and source categories that may be regulated under the generic MACT NESHAP in the future are summarized below.

The initial notification is due one year after the date of promulgation for existing sources. The notification of compliance status would be submitted 60 days following completion by the source of the compliance demonstration specified in the regulation.

Major sources would be required to submit periodic excess emissions and CPMS performance summary reports on a semi-annual basis. Major sources must submit startup, shutdown, malfunction reports semi-annually when actions taken in the event of a startup, shutdown, or malfunction are consistent with the source's startup, shutdown, malfunction plan. If actions taken are not consistent with the source's plan, an immediate report must be submitted.

The equipment leak standards would require the submittal of an initial report and semi-annual reports of LDAR experiences and any changes to the processes, monitoring frequency and initiation of a quality improvement program. The schedule for submission of these reports is detailed below.

For existing sources, the owner or operator would be required to submit the initial report within 90 days after the

applicability date of standards for an affected source under the generic MACT NESHAP. For new sources, the initial report would be submitted with the application for construction.

Every 6 months after the initial report, a report would be submitted that summarizes the monitoring results from the LDAR program and provides a notification of initiation of monthly monitoring, if applicable.

5. Nonduplication, Consultations, and Other Collection Criteria

(a) Nonduplication.

A search of the EPA's existing standards and ongoing ICRs revealed no duplication of information gathering efforts. However, certain reports required by State or local agencies may duplicate information required under the generic MACT NESHAP. In such cases, a copy of the report submitted to the State or local agency can be provided to the Administrator in lieu of the report required by the generic MACT NESHAP.

(b) Consultations.

Consultations with numerous representatives of companies involved in CB production, CY production, ET production, and SP production source categories were conducted in the presumptive MACT development process and the generic MACT NESHAP development process which establishes MACT for each of these source categories. Tables 9, 10, 11, and 12 present the names, affiliation, and telephone numbers of persons that provided input during the development of the proposed generic MACT NESHAP for the CB production, CY production, ET production, and SP production source categories. For future source categories that would be regulated under the generic MACT NESHAP the EPA would consult with industry representatives and State agencies when developing the presumptive MACT and MACT for an applicable source category.

A 90-day public comment period will be provided after proposal, during which all affected parties will be given the opportunity to comment on the generic MACT NESHAP. All received comments will be considered and some may be reflected in the development of the promulgated generic MACT NESHAP.

TABLE 9. CARBON BLACK PRODUCTION CONSULTATIONS

Name	Affiliation	Telephone number
Penny Lassiter	U.S. Environmental Protection Agency	(919) 541-5396
John Schaefer	U.S. Environmental Protection Agency	(919) 541-0296
Bill Fleming	Cabot Corporation	(678) 297-1534
Todd Williams	Chevron Chemical Company	(281) 421-6386
Roy Holder	Columbian Chemicals Company	(770) 792-9432
Todd N. Miller	Continental Carbon Company	(281) 647-3858
John Tarabocchia	Degussa-Hüls Corporation	(334) 443-3537
Jimmy Boyd	Engineered Carbons, Incorporated	(806) 273-1454
Herb Harless	Sid Richardson Carbon Company	(817) 338-8386
James Orgeron	Louisiana DEQ	(225) 765-0131
Evelina Morales	Oklahoma DEQ	(405) 702-4194
Fred Wilson	Texas NRCC	(512) 239-1285
James Randall	Texas NRCC	(512) 239-1078
Renu Chakrabarty	West Virginia DEP	(304) 558-0885

TABLE 10. CYANIDE CHEMICALS MANUFACTURING CONSULTATIONS

Name	Affiliation	Telephone number
Penny Lassiter	U.S. Environmental Protection Agency	(919) 541-5396
Keith Barnett	U.S. Environmental Protection Agency	(919) 541-5605
Martin Brittain	U.S. Environmental Protection Agency	(214) 665-7296
Diane McConkey	U.S. Environmental Protection Agency	(202) 564-5588
Jeff Gilman	BP Amaco	(630) 420-5205
Ann Goulet	BP Amaco	(419) 226-1239
Van A. Boone	BP Chemicals	(361) 552-8642
Erica Dromgolle	BP Chemicals	(361) 552-8642
Rasma Zvaners	Chemical Manufacturers Association	(703) 741-5249
Anita Junker	Cytec	(504) 431-6556
Orey Tanner	Cytec	(504) 431-6556
Mark Armentrout	Degussa Corporation	(334) 443-4250
David Jelly	The Dow Chemical Company	(713) 246-0133
Debbie Mulrooney	Du Pont Chemicals	(302) 774-8083
Scott Collins	Du Pont Chemicals	(361) 572-1538
Ellen Lane	Du Pont Chemicals	(409) 882-3290
Walter Schrimper	Du Pont Chemicals	(901) 353-7595
Dale Clark	FMC	(307) 872-2195
Richard Ober	Louisiana Department of Environmental Quality	(225) 765-0113
Bill Sprott	Memphis and Shelby County Health Department	(901) 544-7725
Bruce Raff	Novartis	(225) 642-1686
Dave Fewell	Rhone-Poulenc	(304) 767-6771
Richard DiMenna	Rohm & Haas Incorporated	(281) 592-2339
Edward G. Fiesinger	Solutia Incorporated	(281) 228-4486
Jeffery S. Gilbert	Sterling Chemicals	(409) 945-4431
Ruben Herrera	Texas Natural Resource Conservation Commission	(512) 239-5866

TABLE 11. ETHYLENE PRODUCTION CONSULTATIONS

Name	Affiliation	Telephone number
Penny Lassiter	U.S. Environmental Protection Agency	(919) 541-5396
Warren Johnson	U.S. Environmental Protection Agency	(919) 541-5124
Robert Todd	U.S. Environmental Protection Agency	(214) 665-2156
Martin Brittain	U.S. Environmental Protection Agency	(214) 665-7296
Diane McConkey	U.S. Environmental Protection Agency	(202) 564-5588
Trish Messenger	Chemical Manufacturers Association	(703) 534-3582
John Ogle	Dow	(409) 238-2819
Stan Labat	Exxon	(225) 359-7226
James Orgeron	Louisiana DEQ	(225) 765-3595
Donna Hathaway	Louisiana DEQ	(225) 765-0182
Dana Poppa-Vermillion	Texas NRCC	(512) 239-1280

TABLE 12. SPANDEX PRODUCTION CONSULTATIONS

Name	Affiliation	Telephone Number
Lance Granger	Bayer Corporation	(803) 820-6201
Ron Shifflett	DuPont	(540) 949-2844
Rodney Gearhart	Globe Manufacturing	(508) 674-3585
Larry Brown	Alabama DEM	(334) 271-7861
Tom Garrett	Alabama DEM	(334) 271-7861
Don Squires	Massachusetts DEP	(617) 292-5618
Mike Landis	North Carolina DEM	(704) 663-1699
Kisha Thompson	South Carolina BAQ	(803) 734-5117
Michael Kiss	Virginia APC	(540) 574-7822
Gordon Kerby	Virginia APC	(540) 574-7822
Gerald Potamis	US EPA Region 1	(617) 918-1651
Dianne Walker	US EPA Region 3	(215) 566-3297
Lee Page	US EPA Region 4	(404) 562-9131
Kathleen Reeves Fornay	US EPA Region 4	(404) 562-9130
Angela Catalano	US EPA Region 7	(913) 551-7411
K.C. Hustvedt	US EPA	(919) 541-5395
Elaine Manning	US EPA	(919) 541-5499

(c) Effects of Less Frequent Collection.

If the relevant information were collected less frequently, the EPA would not be reasonably assured that an affected source is in compliance with the generic MACT NESHAP. In addition, the EPA's authority to take administrative action would be reduced significantly.

Section 113(d) of the Act limits the assessment of administrative penalties to violations which occur no more than 12 months before initiation of the administrative proceeding. Since administrative proceedings are less costly and require use of fewer resources than judicial proceedings, both the EPA and the regulated community benefit from preservation of the EPA's administrative powers.

(d) General Guidelines.

The generic MACT NESHAP would require owners or operators of an affected source to retain records for 5 years, which exceeds the 3 year retention period contained in the guidelines in 5 CFR 1320.6. The 5 year retention period is consistent with the provisions of the General Provisions of 40 CFR Part 63 and the retention requirement in the operating permit program under Title V of the Act.

(e) Confidentiality and Sensitive Questions.

i. Confidentiality. All information submitted to the EPA for which a claim of confidentiality is made will be safeguarded according to the EPA policies set forth in Title 40, Chapter 1, Part 2, Subpart B, Confidentiality of Business Information. See 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 3999, September 8, 1978; 43 FR 42251, September 28, 1978; and 44 FR 17674, March 23, 1979. Even when the EPA has determined that data received in response to an ICR is eligible for confidential treatment under 40 CFR Part 2, Subpart B, the EPA may nonetheless disclose the information if it is "relevant in any proceeding"

under the statute [42 U.S.C. § 7414 (C); 40 CFR 2.301 (g)]. This information collection complies with the Privacy Act of 1974 and Office of Management and Budget (OMB) Circular 108.

ii. Sensitive Questions. Information to be reported consists of emissions data and other information that are not of a sensitive nature. No sensitive personal or proprietary data are being collected.

6. Estimating Burden and Cost of the Collection

(a) Estimating Respondent Burden.

The existing major source annual burden estimates for recordkeeping and reporting are presented in Tables 1a through 1d for CB production; Tables 2a through 2d for CY production; Tables 3a through 3d for ET production; and Tables 4a through 4d for SP production. There is no annual burden estimate for new major sources based on the assumption that there will be very few new sources subject to the generic MACT NESHAP in the first 3 years after promulgation of standards for these source categories.

The estimates of total technical labor hours per year per source and the number of activities per respondent per year listed in each table are based upon experience with similar information collection requirements in other standard development efforts and the number of emission points in each source. Activities that are one-time only activities are noted in the tables.

[Table 1a]

[End Table]

[Table 1b]

[End Table]

[Table 1c]

[End Table]

[Table 1d]

[End Table]

[Table 2a]

[End Table]

[Table 2b]

[End Table]

[Table 2c]

[End Table]

[Table 2d]

[End Table]

[Table 3a]

[End Table]

[Table 3b]

[End Table]

[Table 3c]

[End Table]

[Table 3d]

[End Table]

[Table 4a]

[End Table]

[Table 4b]

[End Table]

[Table 4c]

[End Table]

[Table 4d]

[End Table]

(b) Estimating Respondent Costs.

The information collection activities for the first 3 years for affected sources subject to the generic MACT NESHAP with this proposal are presented in Tables 1a through 4d. The costs of these activities are based on the 1992 Comprehensive Assessment and Information Rule (CAIR) economic analysis with estimated wage rates of $66.73 per hour ($66.73/hr) for management labor, $45.04/hr for technical labor, and $28.14/hr for administrative labor. For the purposes of this analysis, it is assumed that each labor hour is composed of 5 percent management, 85 percent technical, and 10 percent administrative. The EPA believes that these estimates reflect the maximum ICR burden that would occur as a result of the generic MACT NESHAP, considering source categories that could be potentially regulated under the generic MACT NESHAP in the future.

(c) Estimating the EPA's Burden and Cost.

Because the information collection requirements were developed as an incidental part of the generic MACT NESHAP, no costs can be attributed to the development of the information collection requirements.

Because recordkeeping and reporting requirements on the part of the respondents are required under section 112 of the Act, no operational costs will be incurred by the Federal government. Publication and distribution of the information are part of the AFS operated and maintained by OAQPS, with the result that no Federal costs can be directly attributed to the ICR.

Examination of records to be maintained by the respondents will occur incidentally as part of the periodic inspection of affected sources. Periodic inspections are part of the EPA's overall compliance and enforcement program. Therefore, these examinations are not attributable to the ICR. The only costs that the Federal government will incur are user costs associated

with the analysis of the reported information, as presented in Tables 5a through 5d for source categories regulated under the generic MACT NESHAP with this proposal. These burden estimates assume that there will be no new sources in the first 3 years following promulgation of standards for the subject source categories. Labor rates and associated costs are based on estimated wage rates $56/hr (GS-15/3 level) for management, $34/hr (GS-12/3 level) for technical, and $17/hr (GS-6/3 level) for administrative. Labor rates include 60 percent for overhead expenses.

[Table 5a]

[End Table]

[Table 5b]

[End Table]

[Table 5c]

[End Table]

[Table 5d]

[End Table]

[Table 6a]

[End Table]

[Table 6b]

[End Table]

[Table 6c]

[End Table]

[Table 6d]

[End Table]

[Table 7a]

[End Table]

[Table 7b]

[End Table]

[Table 7c]

[End Table]

[Table 7d]

[End Table]

[Table 8a]

[End Table]

[Table 8b]

[End Table]

[Table 8c]

[End Table]

[Table 8d]

[End Table]

(d) Bottom Line Burden Hours and Costs/Master Tables.

i. The Simple Collection. The bottom line respondent burden hours and costs, presented in Tables 1a through 4d, are calculated by adding total person-hours and costs from each of the tables.

The estimated total nationwide burden for the first 3 years for regulated major sources being added to the generic MACT NESHAP would be an estimated 33,926 total labor hours per year at a cost of approximately $1,510,000 per year.

The total estimated annual labor hour reporting and recordkeeping burden is 33,936. The total annualized capital and startup costreflects the estimated capital costs for equipment required for monitoring, inspection, recordkeeping, and reporting (MIRR) activities associated with the major source provisions of the proposed standards. The total estimated installed capital costs of this equipment is $2,119,000 for the CB production source category, $53,000 for the CY production source category, $2,663,000 for the ET production source category, and $66,000 for the SP production source category, for an annual estimated total of $4,901,000.

The total annual estimated operating and maintenance costs (O&M)are calculated based on (1) the estimated storage, filing, photocopying, and postage costs for the estimated total number of annual responses associated with the proposed provisions for each of the source categories and (2) the O&M costs for the equipment required for CPMS. Storage, filing, and photocopying costs per response is estimated at 0.5 hour of administrative labor at a rate of $25/hr or $12.50 per response for multiple copies. First class postage is estimated at $7.63 per response for mailing of an one pound package and two one half pound packages to regulatory agencies. The total storage, filing, photocopying, and postage cost per response is approximately $20.13. The total

annual estimated O&M cost is $1,900 for the CB production source category based on 93 responses, $1,300 for the CY production source category based on 65 annual responses, $3,000 for the ET production source category based on 150 responses, and $9,600 for the SP source category based upon 13 responses plus CPMS costs, for an annual estimated total of $15,800 for 312 responses.

ii. The EPA Tally. The bottom line Federal government burden hours and costs that would result from this ICR are presented in Tables 5a through 8d for the source categories being proposed with this proposal. These estimates are calculated by adding total person-hours and costs from each of the tables. Table 5d summarizes the Federal government burden hours and costs for existing CB production, CY production, ET production, and SP production source categories.

The estimated total annual labor hours and costs of the generic MACT NESHAP for the CB production, CY production, ET production, and SP production source categories in the first 3 years after promulgation are approximately 3,465 total labor hours per year at a cost of approximately $116,527 per year.

iii. The Complex Collection. This collection is a simple collection, therefore, this section does not apply.

iv. Variations in the Annual Bottom Line. Variation in the annual bottom line for this regulation may occur (1) due to the fact that certain one-time activities would typically occur in the first year following promulgation of the rule and (2) by the third year following promulgation of the rule, when all sources must be in compliance, and will therefore be subject to recurring recordkeeping and reporting requirements.

(e) Reasons for Change in Burden.

This section does not apply because this is a new collection.

PART B OF THE SUPPORTING STATEMENT

Not applicable. No sampling or other methods are used to select respondents because all owners and operators of facilities subject to the generic MACT NESHAP would be required to collect information.

ATTACHMENT 1

SOURCE DATA AND INFORMATION REQUIREMENTS

REQUIREMENT	REGULATION CITATION
MONITORING & INSPECTION	
• Install, maintain, adjust, and calibrate CPMS	§63.996(c)
• Inspect and monitor covers	§63.1063(c)
• Inspect and monitor closed-vent or heat exchange system	§63.983(b) §63.983(c) §63.1084(a)
• Monitor control device	§63.984(b) §63.986(c) §63.987(c) §63.988(c) §63.989(c) §63.990(c) §63.991(c) §63.992(c) §63.993(c) §63.994(c) §63.995(c) §63.996(c)

REQUIREMENT	REGULATION CITATION
• Develop startup, shutdown, and malfunction plan	§63.1110(b) §63.1111
RECORDKEEPING	
• Records of maintenance	§63.1088(b) §63.1090(c) §63.1089 §63.1109(a)
• Records of startup, shudown and malfunction and actions taken	§63.998(d)
• Records of malfunctioning or inoperative CPMS	§63.998(c)
• Records of CPMS operation, adjustments, calibration checks, and maintenance	§63.998(c)
• Records of performance test and performance evaluation results	§63.998(a)
• Records of initial and compliance status notifications	§63.998(a)
REPORTS	
• Initial Notification	§63.1110(a) §63.1110(c)
• Initial Compliance Status Report	§63.1110(a) §63.1110(d)

REQUIREMENT	REGULATION CITATION
• Notification of performance evaluation and performance test dates	§63.1110(a)
• Performance test and performance evaluation results	§63.1090 §63.1110(d)
• Startup, shutdown, and malfunction reports	§63.1110(a) §63.1111
• Excess emissions and CPMS performance report	§63.1110(a)
• Excess emissions and CPMS performance summary report	§63.1110(a)
• Operating parameter value and rationale selection	§63.1110(a) §63.1111
• Conduct control device performance test	§63.987(c) §63.988(b) §63.989(b) §63.990(b) §63.991(b) §63.992(b) §63.993(b) §63.994(b) §63.995(b)
• Conduct CPMS performance evaluation	§63.996(b)